

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

STEVE HANEY,  Plaintiff,  vs.  AMERICAN FAMILY MUTUAL INSURANCE COMPANY,  Defendant.	CIV. 16-4113  <b>JOINT MOTION FOR ENTRY OF GENERAL PROTECTIVE ORDER</b>
---	---

COMES NOW Plaintiff Steve Haney (“Plaintiff”) and Defendant American Family Mutual Insurance Company (“American Family”) [collectively, the “Parties”], and jointly move for the entry of a General Protective Order, which would govern the disclosure of proprietary, confidential, and/or trade secret information as part of the discovery process and limit the dissemination of such proprietary, confidential and/or trade secret information only the extent necessary for the prosecution or defense of this matter and not for any other use or purpose. In support of this Motion, the Parties state as follows:

1. Plaintiff has served Interrogatories, Requests for Production and Requests for Admission (First Set) to American Family in this matter.
2. Given the nature of the claims and defenses in this matter, and, specifically, the potential involvement of proprietary business, training, and compensation data, the Parties reasonably believe that the discovery in this case (including, but not limited to, responses to Interrogatories, documents produced in response to Requests for Production, and deposition testimony) will require the disclosure of proprietary, confidential, and/or trade secret information

which could be damaging to the Parties (or others) if such information was disseminated to the public.

3. The Parties believe that the entry of a General Protective Order will facilitate the orderly progression of discovery in this case.

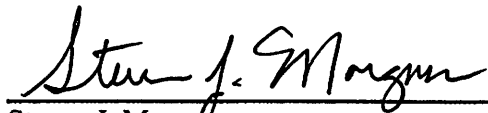
4. Based on the foregoing, the Parties jointly submit a General Protective Order for the Court's consideration, a copy of which is attached hereto and marked as Exhibit "A."

WHEREFORE, the Parties jointly pray for the entry of a General Protective Order without oral hearing and for such further and additional relief as the Court deems reasonable and necessary.

Dated: February 17, 2017.



Derek A. Nelsen  
Eric T. Preheim  
FULLER AND WILLIAMSON, LLP  
7521 South Louise Avenue  
Sioux Falls, SD 57108  
T: (605) 333-0003  
F: (605) 333-0007  
[dnelsen@fullerandwilliamson.com](mailto:dnelsen@fullerandwilliamson.com)  
[epreheim@fullerandwilliamson.com](mailto:epreheim@fullerandwilliamson.com)  
**ATTORNEYS FOR  
PLAINTIFF STEVE HANEY**



Steven J. Morgans  
MEYERS BILLION, LLP  
P.O. Box 1085  
Sioux Falls, SD 57104  
T: (605) 336-3700  
F: (605) 336-3786  
[smorgans@myersbillion.com](mailto:smorgans@myersbillion.com)

Ross W. Johnson\*  
FAEGRE BAKER DANIELS LLP  
801 Grand Avenue, 33rd Floor  
Des Moines, IA 50309-8002  
T: (515) 248-9000  
F: (515) 248-9010  
[ross.johnson@faegrebd.com](mailto:ross.johnson@faegrebd.com)  
*\* Admitted pro hac vice*

**ATTORNEYS FOR DEFENDANT  
AMERICAN FAMILY MUTUAL  
INSURANCE COMPANY**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was filed electronically with the Clerk of Court through ECF and that ECF will send a notice of electronic filing to the following:

Derek A. Nelsen  
Eric T. Preheim  
FULLER AND WILLIAMSON, LLP  
7521 South Louise Avenue  
Sioux Falls, SD 57108  
T: (605) 333-0003  
F: (605) 333-0007  
[dnelsen@fullerandwilliamson.com](mailto:dnelsen@fullerandwilliamson.com)  
[epreheim@fullerandwilliamson.com](mailto:epreheim@fullerandwilliamson.com)  
**ATTORNEYS FOR  
PLAINTIFF STEVE HANEY**

Dated this 17th day of February, 2017

*/s/ Steven J. Morgans*  
\_\_\_\_\_  
Steven J. Morgans  
MEYERS BILLION, LLP  
P.O. Box 1085  
Sioux Falls, SD 57104  
[smorgans@myersbillion.com](mailto:smorgans@myersbillion.com)  
**ATTORNEYS FOR DEFENDANT  
AMERICAN FAMILY MUTUAL  
INSURANCE COMPANY**